

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS,	)	
	)	Case No. 3:21-cv-00923
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANTS’ MOTION FOR RESOLUTION OF DISPUTE UNDER THE  
AGREED CONFIDENTIALITY ORDER**

Defendant, The Lampo Group, LLC (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order dated July 6, 2022 (Doc. #42) (“Confidentiality Order”), moves the Court for resolution of the parties’ dispute regarding information in the deposition transcript of Lampo witnesses designated confidential by Lampo.

As more fully explained in Lampo’s concurrently filed Memorandum of Law (Doc. #119), Plaintiff has taken nine (9) depositions of company witnesses. Defendant designated testimony in seven (7) of the depositions as confidential. Plaintiff disputed certain designations in six (6) of the transcripts. The parties met and conferred in person on August 3, 2023 to discuss the dispute. Plaintiff agreed to review the designations and provide his justification for disputing them.

On August 22, 2023, Plaintiff’s counsel followed up with defense counsel via e-mail. Plaintiff agreed with some of Lampo’s designations but disagreed with the remaining designations and provided his justification for disagreeing. The Confidentiality Order prohibits Plaintiff from publicly filing the designated information for a period of 14 days after informing Lampo that he disagreed with the designations. Plaintiff’s response to Lampo’s summary judgment is due on

September 1, 2023. Plaintiff indicated as recently as August 25, 2023 that he intends to file the designated information publicly despite the grace period set forth in the Confidentiality Order.

To date, the parties have complied with the discovery dispute resolution procedures (Doc. #26, Doc. #97) as required by the Confidentiality Order and have attempted to resolve the dispute. As of August 22, 2023, the parties reached an impasse. Lampo has provided Plaintiff with redacted versions of *all* of the transcripts in which Lampo designated information as confidential. If Plaintiff intends to file the disputed deposition transcripts with his response to Lampo's summary judgment motion, he should file the redacted versions provided by Lampo. If Plaintiff files the redacted transcripts and moves for leave to do so under seal in accordance with Local Rule 5.03, then this Motion is moot. If Plaintiff continues to contest the confidentiality designations, then filing the redacted transcripts will preserve the designated information so that the Court may resolve the dispute in accordance with the Confidentiality Order.

Respectfully submitted,

/s/Leslie Goff Sanders

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**CERTIFICATE OF SERVICE**

I certify that, on August 29, 2023, I filed the foregoing *Defendants' Motion for Resolution of Dispute Under the Agreed Confidentiality Order* via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street  
Lauren J. Irwin  
Brandon G. Hall  
Cullen D. Hamelin  
THE EMPLOYMENT AND CONSUMER LAW GROUP

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/s/Leslie Goff Sanders  
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